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Troy, MI 48084-7121

arvinmeritor.com

April 4, 2007

Mr. Don Webster
USEPA Region IV
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: Corrective Measures Pre-Design Activities Work Plan
Grenada Manufacturing Plant Site; Grenada, Mississippi

Dear Mr. Webster,

On July 18, 2006, ArvinMeritor submitted for approval by U.S. EPA a Pre-Design Activities Work Plan ("Work Plan") for work that will be completed in preparation for implementation of the remaining corrective measures at the Grenada Manufacturing plant site in Grenada, Mississippi ("Site"). ArvinMeritor had requested your review and approval of the Work Plan because it proposed certain changes in the approach to implementing the corrective measures that had been described in the 2003 Corrective Measures Study ("CMS") Report and approved by U.S. EPA. However, in your email correspondence to Don Williams at the plant on February 15, 2007, you indicated that approval by U.S. EPA of the Work Plan was unnecessary in light of U.S. EPA's prior approval of the CMS Report.


Accordingly, based on your email correspondence to Mr. Williams, we will proceed with implementation of the Work Plan starting on April 15, 2007. Following completion of the activities delineated in the Work Plan, ArvinMeritor will provide to U.S. EPA a Corrective Measures Design Work Plan containing the company's recommended approach to implementing the remaining corrective measures to be undertaken at the Site.

BUCKET NO. 633486

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If you have any questions or require additional information, please feel free to contact me at (248) 435-7908.

Sincerely,

A handwritten signature in black ink, appearing to read 'John F. Bozick', with a stylized flourish at the end.

John F. Bozick
Environmental Manager

cc: Don Williams, Grenada Stamping and Assembly
Toby Cook, Mississippi Department of Environmental Quality
Jeffrey M. Karp, Esq., Sullivan & Worcester LLP
Ihsan Al-Fayyomi, Brown and Caldwell
Linda S. Furlough, Esq.

July 24, 2007

Mr. Donald Webster
U.S. EPA, Region 4
Restoration and Underground Storage Tank Branch
RCRA Division
61 Forsyth Street S.W.
Atlanta, GA 30303-3104

Subject: Grenada Manufacturing Facility, Grenada, Mississippi: Progress and
Planned Further Work to Implement Corrective Measures

RESTORATION AND UNDERGROUND STORAGE TANK BRANCH

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Dear Mr. Webster,

This is in follow-up to our discussion on July 10, 2007, regarding the status and timing of performing the corrective measures being undertaken by ArvinMeritor, Inc. (ArvinMeritor) at the Grenada Manufacturing Facility (Facility). Given the apparent misunderstanding regarding the status of our activities, I wanted to take this opportunity to summarize the progress made to date and to apprise you of the ongoing activities and schedule for performance of the corrective measures pre-design activities at the Facility.

As you know, the approved interim measures for the Facility included several source-removal actions and installation of a permeable reactive barrier (PRB) to cut off and treat contamination before it reached Riverdale Creek. Source-removal actions already undertaken include:

- free-product recovery from Areas of Concern (AOC) A and B;
- free-product recovery from MW-2 at the sludge lagoon area (SMWU 4);
- excavation, ex-situ soil-vapor extraction, and stabilization of landfill soils (SWMU 3);
- closure of the former equalization lagoon (SWMU 2);
- closure of the chrome destruct pit (SWMU 14); and
- shutdown and closure of the chrome-plating lines (SWMU 27).

These measures have been completed, and the majority of the source masses were removed. Since the PRB installation was completed in March of 2005, the monitoring program has been ongoing. We have been actively evaluating the data, and we are conducting additional

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field tests to better understand both the PRB's hydraulic and treatment performance, and to better assess the longevity of the reactive material and related maintenance requirements.

In July of 2006, we submitted to you for approval the Corrective Measures Pre-Design Activities Work Plan (Work Plan), in accordance with the requirements of the EPA-approved Corrective Measures Study (CMS) Report. The Work Plan detailed additional investigations in the sludge lagoon and main plant areas to better delineate both dense and light non-aqueous phase liquids (NAPLs) in both areas, delineate contamination in the soils around the sludge lagoon, evaluate the potential for vacuum enhanced LNAPL recovery in AOC B, and assess the potential for solidification/stabilization of the sludge remaining in the lagoon prior to capping. The data from these investigations are needed to complete the design of the approved corrective measures. The Work Plan also included modifications to the activities specified in the CMS Report, which were based on data collected since the installation of the PRB, results of groundwater modeling, and the need to capitalize on the treatment capacity of the barrier. In light of those modifications, ArvinMeritor requested EPA's approval of the Work Plan before commencing the proposed pre-design activities. Upon receipt of your e-mail correspondence to me on April 8, 2007, approving the Work Plan, action was initiated to retain subcontractor drillers, coordinate schedules, and mobilize to the Facility to complete the field activities.

The pre-design field activities are ongoing. We currently have a crew in the field installing the monitoring wells in the sludge-lagoon and main-plant areas to delineate NAPLs in groundwater, and to conduct the soil investigation in the lagoon area. The rainfall over the past few weeks has made accessing the more remote locations around the sludge lagoon difficult. This work was originally scheduled to be completed on July 14th; however, if the area does not dry sufficiently to allow rig access, it may be necessary to complete those activities after work at the main-plant area is completed.

Currently, the sludge lagoon is too wet to safely gain access to collect the samples needed to conduct the sludge characterization and treatability study. We are monitoring the conditions at the lagoon so that, if the area dries sufficiently, we can collect the samples during this mobilization. If this turns out not to be the case, we plan to collect the samples during the first two weeks of August, concurrent with the high-vacuum multi-phase extraction pilot test. These pilot test activities are scheduled to be completed by the end of August.

We will prepare and submit a comprehensive report on the corrective measures pre-design activities once the field and laboratory work is completed. The data will be used to finalize the designs for the corrective measures. It is anticipated that, pending Agency approval, implementation of those remaining measures will begin in November, 2007.

This status report should bring you up-to-date on the progress made, the ongoing work, and our plans for completing the pre-design activities and implementing the remaining corrective measures. We want to thank you and the Agency for your assistance in helping us move the remedial process forward. Achieving the remedial goals for the Facility is very important to ArvinMeritor, and we appreciate being allowed the opportunity to do so under a comprehensive, dynamic, and well-planned approach. We look forward to continuing our cooperative

Mr. Donald Webster

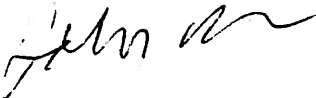
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relationship with you, the Agency, and Mississippi Department of Environmental Quality as we move toward completion of the remedial efforts at the Facility.

While we understand that EPA intends to hold a larger group meeting with Textron, Grenada Manufacturing, and ArvinMeritor in late August or October, ArvinMeritor renews its request for a separate meeting with you and your Branch Chief to be held in early August, to discuss further the contents of this letter and related technical matters. I will call you shortly about scheduling our requested meeting.

Sincerely,



John Bozick

Environmental Manager

cc: Ihsan Al-Fayyomi (Brown and Caldwell)
Jeffrey Karp, Esq. (Sullivan & Worcester)
Linda Furlough, Esq. (ArvinMeritor)